

**United States Bankruptcy Court**  
**Eastern District of Pennsylvania**

In re **Marcos O. Vargas**

Debtor

Case No.  
Chapter

**22-13239/mdc**  
**13**

U.S. Bank, N.A. as trustee on behalf of  
J.P. Morgan Mortgage Acquisition Corp. et al  
Movant

: Chapter 13 No. 22-13239/mdc

: 11 U.S.C. SECTION 362 and 1301

v.

Marcos O. Vargas  
Debtor

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**DEBTOR'S OBJECTIONS TO CERTIFICATION OF**  
**DEFAULT OF STIPULATION**

Debtor, Marcos O. Vargas, by his counsel, Bradly E. Allen files these Objections as follows:

1. Debtor advised his counsel that he has been paying \$630.00 to his mortgage company, Select Portfolio Servicing, Inc. every two weeks for the past few months; and as result, he is current on his payments and not in default of the Stipulation. Debtor will provide proof of the payments if a hearing is scheduled in this matter.

2. It would be inequitable for the Court to enter an Order for Relief since Debtor states that he is current on his mortgage payments.

WHEREFORE, Debtor respectfully requests this Honorable Court to deny Movant' request that an Order for Relief be entered.

Dated: October 23, 2023

Respectfully submitted:

/s/Bradly E. Allen, Esquire

Attorney for Debtor  
7711 Castor Avenue  
Philadelphia, PA 19152  
Phone : 215-725-4242

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## ORDER

AND NOW, this                      day of                      , 2023 it is hereby ORDERED and  
DECREED that Movant, U.S. Bank, N.A.'s . et al request for an Order for Relief from the Automatic  
Stay is hereby denied.

BY THE COURT:

**/S/**

**HONORABLE MAGDELINE D. COLEMAN**  
**U.S. BANKRUPTCY JUDGE**